

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ADRIAN SCHOOLCRAFT,

Plaintiff,

-against-

THE CITY OF NEW YORK, ET AL.,

Defendants.

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**DECLARATION OF
CATHERINE LAMSTEIN-
REISS**

10 Civ. 6005 (RWS)

Catherine Lamstein-Reiss, being duly sworn, deposes and says, pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct to the best of my information, knowledge, and belief:

1. On January 30, 2014, I was deposed in connection with the above-referenced matter.
2. At my deposition I testified about my conversations with New York City Police Department Captain Theodore Lauterborn on October 31, 2009.
3. At my deposition, I testified that on October 31, 2009 “I thought [Capt. Lauterborn] absolutely did need to find [Adrian Schoolcraft] and make sure that he was okay.”
4. I now understand that plaintiff believes I never verbalized this statement to Capt. Lauterborn, but instead that it was simply an unexpressed opinion.
5. The aforementioned statement which I testified to was in response to plaintiff’s counsel asking me “What else did you tell Captain Lauterborn?”

6. In fact, this statement that “I thought [Capt. Lauterborn] absolutely did need to find [Adrian Schoolcraft] and make sure that he was okay” was not just my opinion but a statement that I conveyed to Capt. Lauterborn on October 31, 2009.

Dated: New York, New York
March 5, 2015

Cathy Lamstein-Reiss, Psy.D.
Catherine Lamstein-Reiss